

Bullionix Privacy Policy

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Bullionix is the world's first dapp that enables users to create collectible NFTs (ERC-721 non-fungible tokens) by staking other ERC-20 tokens to them; specifically DGX gold-backed tokens. The result is digitally scarce, golden collectibles that exist immutably on the Ethereum network. Created by Prospectr Studios Pte. Ltd. (Prospectr Studios), Bullionix allows players to create their very own gold backed NFTs referred to as Bullionix collectibles.

Prospectr Studios is committed to protecting and respecting your privacy. This Privacy Policy (this "Policy") sets out how we collect and process personal information about you when you visit our website at www.Bullionix.io, when you use our dapp, when you interact with our smart contracts, or when you otherwise do business or make contact with us.

1. What information do we collect?

A. SUMMARY

Bullionix collects minimal amounts of data to enable us to operate the dapp effectively, and to provide you with the best experiences on our website and our dapp. You provide some of this data to us directly, such as when you register to use our dapp, subscribe to a newsletter, respond to a survey, make an enquiry through our website, contact us for support, or contact us as a prospective user, vendor, supplier, or consultant. We get some of your data by recording how you interact with our website and our dapp by, for example, using technologies like

cookies. We may also obtain and process data in the context of making the dapp available to you.

B. LEARN MORE

You have choices about the data we collect. When you are asked to provide personal data, you may decline. But if you choose not to provide data that is necessary to enable us to make the dapp available to you, you may not be able to sign up for or play the dapp. The data we collect depends on the context of your interactions with Bullionix, and the choices you make (including your privacy settings). The data we collect can include the following:

Email and Metamask Wallet Address. We may collect your email address and your Metamask wallet address.

Device and Usage information. We may collect data about your device and how you and your device interact with Bullionix and our dapp. For example, we may collect your interactions on our website, your feature usage patterns, location data, and your interactions with us. We may also collect data about your device and the network you use to connect to our dapp; this may include data such as your IP address, browser type, operating system, and referring URLs.

2. What do we use your information for?

A. SUMMARY

We use the data we collect to operate our business, and to make the dapp available to you. This includes using the data to improve our dapp, and to personalize your experiences. We may also use the data to communicate with you to, among other things, inform you about your account, provide security updates, and give you information

about the dapp. We may also use the data to manage your email subscriptions, improve the relevance and security of our website, respond to user enquiries, send you periodic marketing communications about our dapp, and improve the relevance of our advertising.

B. LEARN MORE

Providing and improving our dapp. We use data to provide the dapp to you, to improve the dapp, and to perform essential business operations. This includes operating the dapp, maintaining and improving the performance of the dapp, developing new features, conducting research, and providing customer support. Examples of such uses include the following:

Providing the dapp. We use data to carry out your transactions with us and to make the dapp available to you. In certain cases, the dapp may include personalized features and recommendations to enhance your enjoyment, and automatically tailor your experience based on the data we have about you.

Technical support. We use data to diagnose problems, and to provide customer care and other support services.

Improving the dapp. We use data to continually improve our website and our dapp, including system administration, system security, and adding new features or capabilities.

Business Operations. We use data to develop aggregate analyses and business intelligence that enables us to operate, protect, make informed decisions, and report on the performance of our business.

Promotions. We may use your data to administer contests, promotions, surveys, or other site features.

Improving Advertising Campaigns. We may use your data to improve our advertising campaigns, primarily in an effort to prevent targeting you with advertisements that are not relevant to you.

Sending Periodic Emails. We may use your data to send you periodic emails. Depending on the marketing preferences you select on your privacy dashboard, we may send you occasional marketing emails about our dapp, which you can unsubscribe from at any time using the link provided in the message.

Generally. We use data to respond to your enquiries and requests relating to our dapp, to create and administer your account, and to provide us with information and access to resources that you have requested from us. We also use data for general business purposes, including, among other things, to improve customer service, to help us improve the content and functionality of our dapp, to better understand our users, to protect against wrongdoing, to enforce our Terms of Use, and to generally manage our business.

Communications. We use data we collect to communicate with you, and to personalize our communications with you. For example, we may contact you to discuss your account, to remind you about features of the dapp that are available for your use, to update you about a support request, or to invite you to participate in a survey. Additionally, you can sign up for email subscriptions, and choose whether you want to receive marketing communications from us.

3. How do we protect your information?

We implement a variety of security measures to maintain the safety of your personal information when you enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential.

4. How do we ensure that our processing systems remain confidential, resilient, and available?

A. SUMMARY

We implement a variety of measures to ensure that our processing systems remain confidential, resilient, and available. Specifically, we have implemented processes to help ensure high availability, business continuity, and prompt disaster recovery. We commit to maintaining strong physical and logical access controls, and conduct regular penetration testing to identify and address potential vulnerabilities.

B. LEARN MORE

High Availability. Every part of the dapp utilizes properly-provisioned, redundant servers (e.g., multiple load balancers, web servers, replica databases) in case of failure. We take servers out of operation as part of regular maintenance, without impacting availability.

Business Continuity. We keep encrypted backups of data daily on Amazon Web Services. While never expected, in the case of production data loss (i.e., primary data stores loss), we will restore organizational data from these backups.

Disaster Recovery. In the event of a region-wide outage, we will bring up a duplicate environment in a different Amazon Web Services region.

Physical Access Controls. Bullionix is hosted on Amazon Web Services and Firebase. Amazon data centers feature a layered security model, including extensive safeguards such as custom-designed electronic access cards, alarms, vehicle access barriers, perimeter fencing, metal detectors, and biometrics. According to the AWS Security Whitepaper: “AWS’s data centers are state of the art, utilizing innovative architectural and engineering approaches. Amazon has many years of experience in designing, constructing, and operating large-scale data centers. This experience has been applied to the AWS platform and infrastructure. AWS data centers are housed in nondescript facilities. Physical access is strictly controlled both at the perimeter and at building ingress points by professional security staff utilizing video surveillance, intrusion detection systems, and other electronic means. Authorized staff must pass two-factor authentication a minimum of two times to access data center floors. All visitors and contractors are required to present identification and are signed in and continually escorted by authorized staff.” Bullionix employees do not have physical access to Google or AWS data centers, servers, network equipment, or storage.

Logical Access Controls. Prospectr Studios is the assigned administrator of its infrastructure on Amazon Web Services, and only designated authorized Bullionix operations team members have access to configure the infrastructure on an as-needed basis behind a two-factor authenticated virtual private network. Specific private keys are required for individual servers, and keys are stored in a secure and encrypted location.

Intrusion Detection and Prevention. Unusual network patterns or suspicious behavior are among Bullionix's biggest concerns for infrastructure hosting and management. Amazon Web Services's intrusion detection and prevention systems (IDS/IPS) rely on both signature-based and algorithm-based security to help identify traffic patterns that are similar to known attack methods. IDS/IPS involves tightly controlling the size and make-up of the attack surface, employing intelligent detection controls at data entry points, and developing and deploying technologies that automatically remedy dangerous situations, as well as preventing known threats from accessing the system in the first place. We do not provide direct access to security event forensics, but we do provide access to our engineering and customer support teams during and after any unscheduled downtime.

5. Do we use cookies?

A. SUMMARY

Yes. Cookies are small files that a site or its service provider transfers to your computers hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. You can choose to disable cookies, but if you do, your ability to use or access certain parts of the dapp or of our website may be affected.

B. LEARN MORE

We use cookies and other similar identifiers to understand and save your preferences for future visits, to advertise to you on other sites, and to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies. You can find information on popular browsers and how to adjust your cookie preferences at the following websites:

- [Microsoft Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

However, if you choose to disable cookies, you may be unable to access certain parts of our site. A banner asking you to accept our cookies policy will be displayed upon the first visit to our website (or the first visit after you delete your cookies). Unless you have adjusted your browser setting so that it will refuse cookies and/or you have not accepted our cookies policy, our system will issue cookies when you log on to our site.

Our web pages may contain electronic images known as web beacons (also called single-pixel gifs) that we use to help deliver cookies on our websites, and to count users who have visited those websites. We may also include web beacons in our promotional email messages or newsletters, to determine whether and when you open and act on them.

In addition to placing web beacons on our own websites, we sometimes work with other companies to place our web beacons on their websites or in their advertisements. This helps us to develop statistics on how often clicking on an advertisement on a Bullionix

website results in a purchase or other action on the advertiser's website.

Finally, our dapp may contain web beacons or similar technologies from third-party analytics providers that help us compile aggregated statistics about the effectiveness of our promotional campaigns or other operations. These technologies enable the analytics providers to set or read their own cookies or other identifiers on your device, through which they can collect information about your online activities across applications, websites or other products.

6. Do we disclose any information to outside parties?

A. SUMMARY

We share your personal data with your consent, or as necessary to make the dapp available to you. We also share your data with vendors working on our behalf; when required by law or to respond to legal process; to protect our customers; to protect lives; to maintain the security and integrity of our dapp; and to protect our rights or our property.

B. LEARN MORE

We share your personal data with your consent, or as necessary to make the dapp available to you. We also share personal data with vendors or agents working on our behalf for the purposes described in this Policy. For example, companies we have hired to provide cloud hosting services, off-site backups, and customer support may need access to personal data to provide those functions. In such cases, these companies are required to abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose. If you have questions or

concerns about any of our vendors, feel free to contact us at contact@Bullionix.io.

We may disclose your personal data as part of a corporate transaction such as a corporate sale, merger, reorganization, dissolution, or similar event. Finally, we will access, transfer, disclose, and/or preserve personal data, when we have a good faith belief that doing so is necessary to:

- (1) comply with applicable law or respond to valid legal process, judicial orders, or subpoenas;
- (2) respond to requests from public or governmental authorities, including for national security or law enforcement purposes;
- (3) protect the vital interests of our users, customers, or other third parties (including, for example, to prevent spam or attempts to defraud users of our products, or to help prevent the loss of life or serious injury of anyone);
- (4) operate and maintain the security or integrity of our dapp, including to prevent or stop an attack on our computer systems or networks;
- (5) protect the rights, interests or property of Bullionix or third parties;
- (6) prevent or investigate possible wrongdoing in connection with the dapp; or
- (7) enforce our [Terms of Use](#).

We may use and share aggregated non-personal information with third parties for marketing, advertising, and analytics purposes. We do not sell or trade your personal information to third parties.

7. How to Access and Control Your Personal Data

A. SUMMARY

You can view, access, edit, delete, or request a copy of your personal data for many aspects of the dapp via your user dashboard. You can also make choices about Bullionix's collection and use of your data. You can always choose whether you want to receive marketing communications from us. You can also opt out from receiving marketing communications from us by using the opt-out link on the communication, or by visiting your user dashboard.

B. LEARN MORE

Data Access. You can access your personal data on your account's user dashboard.

Data Portability. You can request a copy of your personal data by submitting an email to us at contact@Bullionix.io and including "Please send me a copy of my personal data" in the "Subject" line. Bullionix will verify your ability to access that email, then send you a digital export of the data we hold that is associated with your email address. We will use reasonable efforts to respond to your request within 14 days, but in all events within 30 days of our receipt of the request. Bullionix may be limited in its ability to send certain personal data to you (e.g., the identification of your Metamask wallet).

Data Erasure. You can delete your personal data on your account's user dashboard. Please be aware that we require certain information about you in order to make the dapp available to you; this means that if you want to delete any of these critical pieces of personal data, you may be required to delete your entire profile and no longer be able to access or play the dapp. Alternatively, you may request that Bullionix

delete your personal data by submitting an email to us at contact@Bullionix.io and including “Please delete my personal data” in the “Subject” line. Bullionix will verify your ability to access that email, then delete the personal data associated with your email address. We will use reasonable efforts to respond to your request within 14 days, but in all events within 30 days of our receipt of the request.

Data Correction. You can modify your personal data on your account’s user dashboard. Note that since some of the data we collect is specific to you – for example, your Metamask wallet address – you may not be able to modify this data without needing to create a new user profile.

Your Communications Preferences. You can choose whether you wish to receive marketing communications from us. If you receive marketing communications from us and would like to opt out, you can do so by following the directions in that communication. You can also make choices about your receipt of marketing communications by signing into your account, and viewing and managing your communication permissions in your account’s user dashboard, where you can update contact information, manage your contact preferences, opt out of email subscriptions, and choose whether to share your contact information with Bullionix and our partners. Alternatively, you can request that we withdraw consent to use your personal data by submitting an email to us at contact@Bullionix.io and including “Please withdraw my consent for marketing communications” in the “Subject” line. Bullionix will verify your ability to access that email, then update our systems to remove your email address from the system we use to send marketing communications. We will use reasonable efforts to respond to your request within 14 days, but in all events within 30 days of our receipt of the request.

Please note that these choices do not apply to mandatory communications that are part of the dapp, or to surveys or other informational communications that have their own unsubscribe method.

8. Third Party Links

Occasionally, at our discretion, we may include or offer third party products or services on our website or through our dapp. If you access other websites using the links provided, the operators of these websites may collect information from you that will be used by them in accordance with their privacy policies. These third party sites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

9. Where we Store and Process Personal Data; International Transfers

Personal data collected by Bullionix may be stored and processed in Singapore or in any other country where Bullionix or its affiliates, subsidiaries or service providers maintain facilities. The storage location(s) are chosen in order to operate efficiently, to improve performance, and to create redundancies in order to protect the data in the event of an outage or other problem. We take steps to ensure that the data we collect is processed according to the provisions of this Policy, and the requirements of applicable law wherever the data is located.

10. Data Retention

A. SUMMARY

We may retain your personal information as long as you continue to use the dapp, have an account with us, or for as long as is necessary to fulfill the purposes outlined in this Policy. You can ask to close your account by contacting us as described above, and we will delete your personal information on request. We may, however, retain personal information for an additional period as is permitted or required under applicable laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

B. LEARN MORE

We will retain your personal data for as long as necessary to make the dapp available to you, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. Because these needs can vary for different types of data, actual retention periods can vary significantly. The criteria we use to determine the retention periods include:

- How long is the personal data needed to make the dapp available to you and/or operate our business? This includes such things such as maintaining and improving the performance of the dapp, keeping our systems secure, and maintaining appropriate business and financial records. This is the general rule that establishes the baseline for most data retention periods.
- Is there an automated control, such as in your user dashboard, that enables you to access and delete the personal data at any time? If there is not, a shortened data retention time will generally be adopted.
- Is the personal data of a sensitive type? If so, a shortened retention time would generally be appropriate.
- Has the user provided consent for a longer retention period? If so, we will retain the data in accordance with your consent.
- Is Bullionix subject to a legal, contractual, or similar obligation to retain the data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation.

11. Changes to our Privacy Policy

We will update this privacy statement when necessary to reflect customer feedback and changes to our dapp. When we post changes to this statement, we will revise the "last updated" date at the top of the statement. If there are material changes to the statement or in how Bullionix will use your personal data, we will notify you either by prominently posting a notice of such changes before they take effect or by sending you a notification directly. We encourage you to periodically review this privacy statement to learn how Bullionix is protecting your information.

12. How to Contact Us

If you have a technical or support question, please send us an email at contact@Bullionix.io.

If you have a privacy concern, complaint, or a question for the Data Protection Officer of Bullionix, please contact us by sending us an email at contact@Bullionix.io. We will respond to questions or concerns within 30 days.

Unless otherwise stated, Bullionix is a data controller for personal data we collect through the dapp subject to this statement. Our address is Prospectr Studios Pte. Ltd., 37 Jurong East Avenue 1 #03-05, Parc Oasis Singapore (609775).